R-RICHES PLANNING LIMITED 盈卓規劃有限公司

Our Ref. : DD83 Lots 1488 & 1489
Your Ref. : TPB/A/NE-LYT/882

The Secretary,
Town Planning Board,
15/F, North Point Government Offices,
333 Java Road,
North Point, Hong Kong

By E-mail

29 October 2026

Dear Sir,

Further Information

Proposed Temporary Public Vehicle Park (excluding Container Vehicle)
and Associated Filling of Land for a Period of 3 Years in "Agriculture" Zone,
Lots 1488 (Part) and 1489 (Part) in D.D. 83, Lung Yeuk Tau, Fanling, New Territories

(S.16 Planning Application No. A/NE-LYT/882)

We write to provide further information in response to departmental and public comments on the captioned application.

Should you require more information, please contact the undersigned at [redacted] Thank you for your kind attention.

Yours faithfully,

For and on behalf of
R-riches Planning Limited

Christian CHIM
Town Planner

cc DPO/FSYLE, PlanD (Attn.: Mr. Pater NGAN email: pplngan@pland.gov.hk)
(Attn.: Ms. Esther LI email: ehlli@pland.gov.hk)

Response-to-Comment (RtC)

Proposed Temporary Public Vehicle Park (excluding Container Vehicle)
and Associated Filling of Land for a Period of 3 Years in "Agriculture" Zone,
Lots 1488 (Part) and 1489 (Part) in D.D. 83, Lung Yeuk Tau, Fanling, New Territories

(S.16 Application No. A/NE-LYT/882)

(i) An RtC table:

Departmental Comments		Applicant's Responses
1. Comments of the District Lands Officer/North, Lands Department (DLO/N, LandsD)		
(a)	The application site (the Site) comprises Old Schedule Agricultural Lots 1488 (Part) and 1489 (Part) in D.D. 83 held under the Block Government Lease which contains the restriction that no structures are allowed to be erected without the prior approval of the Government. Besides, according to the vehicular access plan of the planning statement, the proposed vehicular ingress/egress requires to pass through other private lots, the applicant shall make his own arrangement as there is no such right granted to the Site.	Noted.
(b)	Unlawful occupation of Government land (GL) not covered by the planning application The GL adjoining the said private lot has been fenced off without permission. Please clarify the extent of the application site with the applicant. His office reserves the rights to take necessary land control action against the illegal occupation of GL without further notice. The lot owner shall realign the fence and cease the illegal occupation of the adjoining GL not covered by the subject planning application immediately.	Noted. Should the application be approved by the Town Planning Board, the applicant will strictly follow the approved scheme and confine the operation of the proposed development within the site boundary of the application site (the Site).
(c)	The lot owner should comply with all the land filling requirements imposed by relevant Government departments.	Noted.

Departmental Comments		Applicant's Responses
2. Comments of the Commissioner for Transport (C for T)		
(a)	It is noted that the Site is proposed to provide parking spaces for the taxi fleet. However, there are 10 nos. of parking spaces of light goods vehicle (LGV) proposed within the Site. Please explain.	The applicant's fleet comprises various vehicle models. According to the applicant, the body dimension of the largest model (the Premium 6-seater Electrical Vehicles (EV) (specifications enclosed at **Annex 1**) measures 5,490 mm (L) × 1,980 mm (W) × 2,050 mm (H), which would make normal private car parking spaces insufficient to cope with. As such, the applicant opts to sacrifice the number of parking space by converting some of those into larger parking spaces, so as to allow more spaces for the safe manoeuvering of vehicles within the Site.
(b)	There are only 4 trips each for in and out of private cars (i.e. taxi) for a.m. and p.m. shift-changing hours respectively. Please advise whether the estimated trip generation/attraction can reflect the traffic flow at the situation when all parking spaces are fully utilised.	It is anticipated that not all drivers would return to the Site for their shift-changing. Some of them might change their shifts elsewhere. Meanwhile, those taxis which are not in use by the fleet's driver will be stationed at the Site. The estimated trip generation /attraction have already taken the above into account, including the scenario that all parking spaces are fully-utilised, and is considered justifiable.
(c)	It is noted that the local access road leading to the Site is narrow (approximately 4 m in width) and insufficient to accommodate two-way traffic. The applicant should propose mitigation measures to ensure that the vehicles would not clash with other vehicles traveling in reverse direction.	Staff will be deployed to direct incoming/outgoing traffic to ensure road and pedestrian safety.
(d)	Swept path analysis should also be conducted for each type of parking spaces proposed.	Please refer to the swept path analysis conducted for taxi and 6-seater EV taxi at **Annex 2**.
(e)	No vehicle is allowed to queue back to or reverse onto/from public road at any time during the planning approval period.	Noted.
(f)	Sui Wan Road and the local village access road leading to the site from Sui Wan Road are not managed by the Transport Department (TD). The applicant should obtain consent from relevant land owners and maintenance authorities on using these roads.	Noted.

Departmental Comments		Applicant's Responses
3. Comments of the District Planning Officer/Sha Tin, Tai Po and North, Planning Department (DPO/STN, PlanD)		
(a)	With the reference to TD's comments as detailed above and the dimensions for standard parking space for taxi as set out in Table 11 of the Hong Kong Planning Standards and Guidelines (HKPSG) Chapter 8, please justify the proposed provision of 10 LGV-sized parking spaces at the Site.	Please refer to the applicant's response to C for T in Section 2(a) of this table.
(b)	The applicant is advised to substantiate the justifications regarding the suitability of the Site for parking taxis under the taxi fleet.	The proposed development is considered not incompatible with the surrounding areas, which are predominated by temporary structures, parking of vehicle, shop & services for auto-part, car-beauty workshop, etc. Moreover, the proposed development is solely for parking use without any shopfront and workshop activities and erection of structures. The potential significant nuisance to the surrounding areas arising from the proposed development is not anticipated.
(c)	Based on site photos taken during our site inspection on 15.9.2026, the Site was covered with wild vegetation, and a few trees/shrubs of common species were observed. The proposed land filling across the entire Site, as shown on Plan 5 of your submission, may lead to tree felling. This contradicts the Application Form, which states that no tree felling will be involved.	No tree as defined under the Lands Administration Office (LAO) Practice Note (PN) No. 6/2023[1] has been identified thereon. No dead, old, or valuable tree has been found either. As such, no tree felling is involved for the removal of existing vegetation therewithin.
(d)	Please note that the Town Planning Board Secretariat has received a number of public comments objecting to the application on traffic, environmental, drainage, and fire safety grounds. The applicant should take note of these public comments and provide responses as appropriate.	Please refer to Part (ii) below.

(ii) The applicant provides the revised layout plan and revised pages of the Form No. S16-III (**Annex 3**) to clarify the types of parking spaces proposed in the current application.

[1] *With reference to LAO PN No. 6/2023, a plant is considered to be a tree if its trunk diameter measures 95 mm or more at a height of 1.3 m above the ground level.*

(iii) The applicant provides the following information in response to various aspects of the public comments received during the public inspection of the captioned application:

Operational aspect

- the swept path analysis at Annex 2 has demonstrated the smooth manoeuvering of vehicles along the access road between the Site and Sha Tau Kok Road – Lung Yeuk Tau;

- the proposed development involves the operation of a vehicle park for the applicant's own fleets. Given that all drivers under the fleets are registered, and their entrance to the proposed development will be properly recorded, the concerns on gathering of outsiders/unrelated individuals in the vicinity of the Site is not anticipated;

- noting that the private lots of the Site are Old Schedule Lots held under the Block Government Lease, where no structure is allowed without the prior approval of Short Term Waiver (STW) from LandsD. Hence, the provision of EV charging facilities thereon would require the submission of a STW application. Given that all drivers will be required to fully-charge their vehicles before returning to the Site, there is no such need for the provision of EV charging facilities therewithin;

Environmental aspect

- it is estimated that the proposed development would only generate/attract a maximum of 8 trips on an hourly basis during shift-changing hours, whilst that beyond shift-changing hours would be around 4 nos. of trip. Moreover, the additional traffic induced by the proposed development would only involve taxi, i.e. non-heavy vehicles. In view of the low traffic flow and deployment of non-heavy vehicles, the adverse noise and air quality impacts to the surroundings are not anticipated;

Drainage aspect

- should the application be approved by the Town Planning Board (the Board), the applicant will submit a drainage proposal with periphery u-channels and catchpits to alleviate the potential adverse drainage impacts that would have arisen from the proposed development;

- the applicant will implement good practices under *Professional Persons Environmental Consultative Committee Practice Notes 1/23* when maintaining the on-site drainage system at the Site. Hence, the operation of the proposed development should not induce adverse drainage impacts to the area; and

Fire safety aspect

- the applicant will strictly follow the latest *"Fire Safety Requirements (FSRs) for Temporary Storage and Structures under Planning Applications, Short Term Tenancy & Short Term Waiver"* promulgated by the Fire Services Department, under which fire extinguishers will be provided at the proposed development to meet the latest FSRs;

- the applicant will submit the fire service installation proposal, declaration form for the compliance of FSRs and FS251 certificate(s) upon obtaining relevant planning permission from the Board. Hence, the adverse fire safety impact arising from the proposed development is not envisaged; and

- on the issue of pigsties in the vicinity being converted into domestic use, it is advised that the concerned individuals should consult the LandsD in relation to the lease aspect.

Annex 1

Specifications of the Premium 6-seater EV under the applicant's fleet

Annex 1 – Specifications of the Premium 6-seater EV under the applicant's fleet



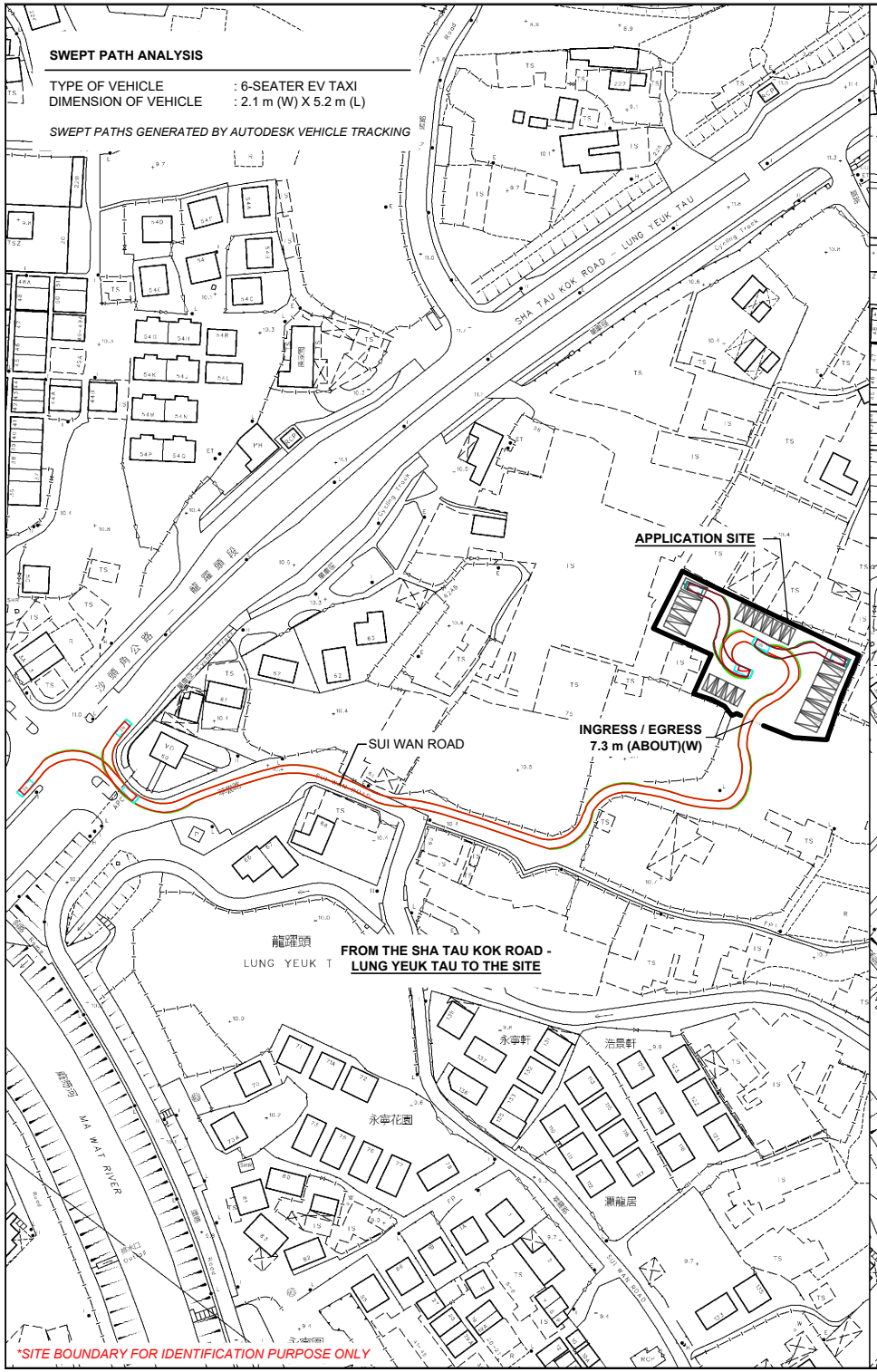


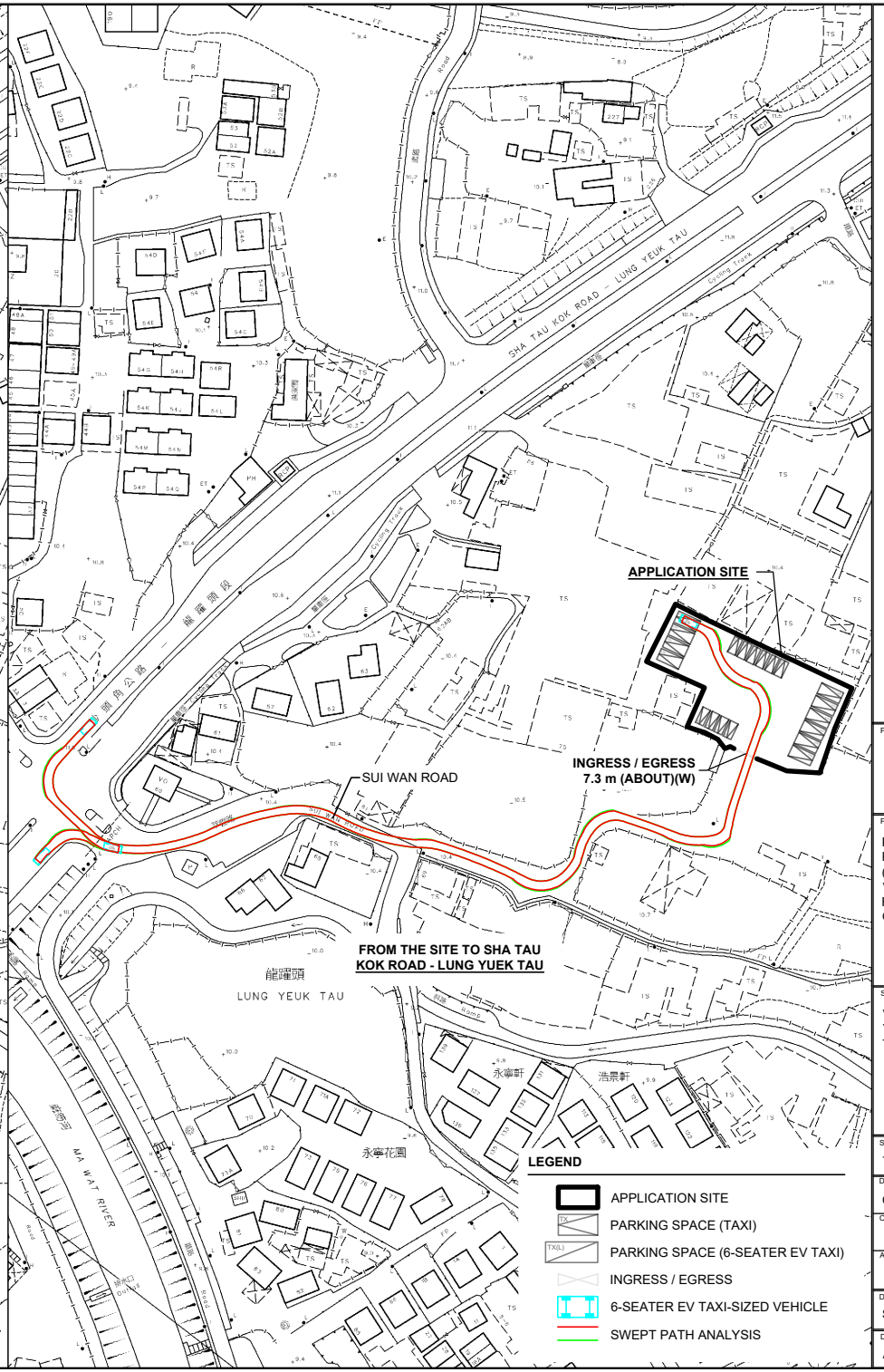
大黃蜂的士車輛規格表

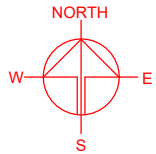
載客量 Passenger Capacity	6人 (不包括司機)
行李容量 Luggage Capacity	6 至 8 件 28 吋大型行李箱
車身體積 (長×闊×高) Body Dimensions (L×W×H)	5,490 × 1,980 × 2,050 mm
電池及續航 Battery & Range	106 kWh 磷酸鐵鋰電池 / 480 km (WLTP)
動力輸出 Power Output	200 kW 最大馬力 / 410 Nm 峰值扭力
驅動系統 Drive System	前置馬達驅動 (Front-Wheel Drive)

Annex 2

Swept path analysis







PLANNING CONSULTANT

R-RICHES PLANNING LIMITED

PROJECT

PROPOSED TEMPORARY PUBLIC VEHICLE PARK (EXCLUDING CONTAINER VEHICLE) AND ASSOCIATED FILLING OF LAND FOR A PERIOD OF 3 YEARS

SITE LOCATION

VARIOUS LOTS IN D.D. 83, LUNG YEUK TAU, FANLING, NEW TERRITORIES

SCALE

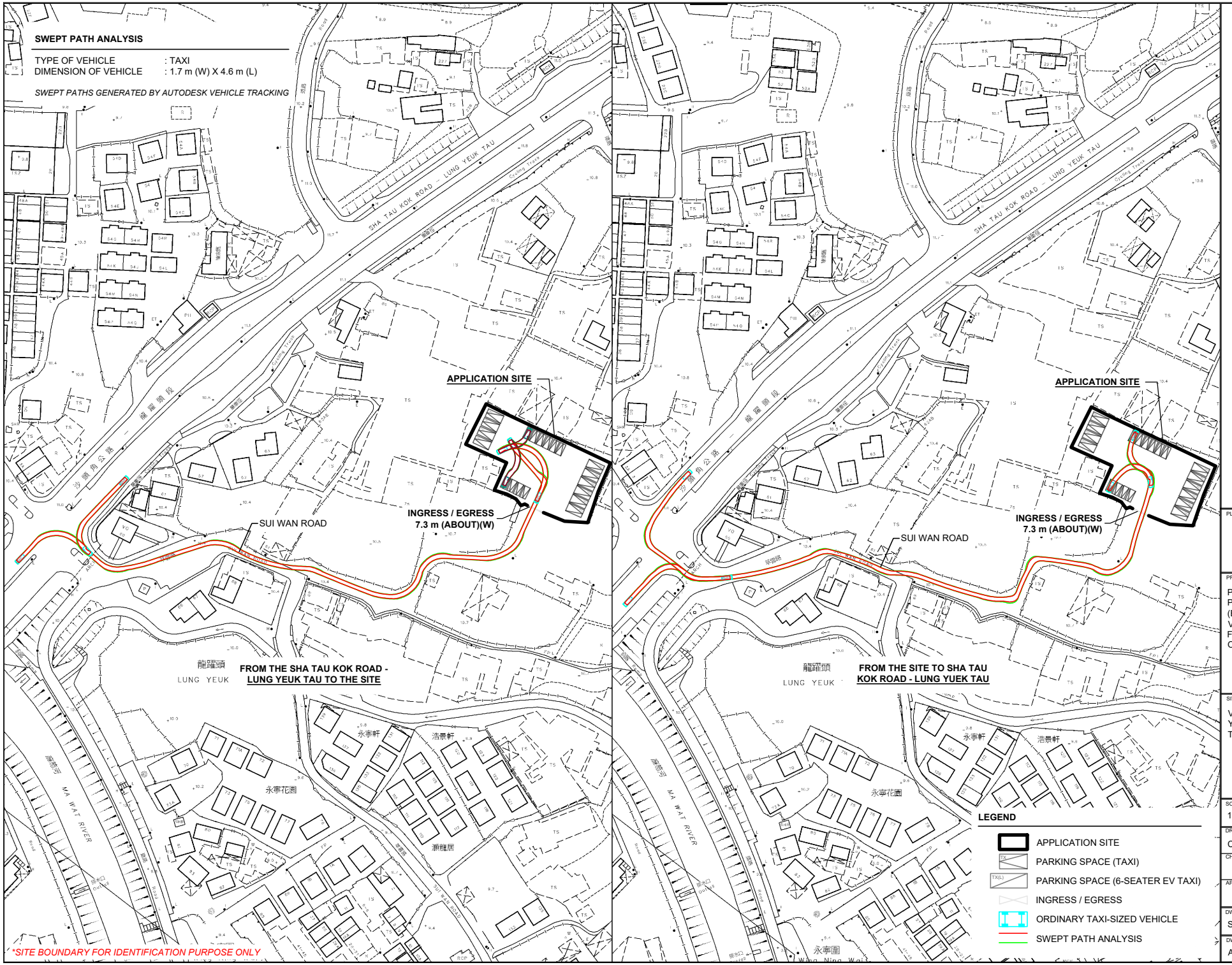
1 : 2000 @ A4

DRAWN BY	DATE
CC	29.10.2026
CHECKED BY	DATE
APPROVED BY	DATE

DWG. TITLE

SWEPT PATH ANALYSIS

DWG NO.	VER.
ANNEX 2 PLAN 01	001



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PROPOSED TEMPORARY PUBLIC VEHICLE PARK (EXCLUDING CONTAINER VEHICLE) AND ASSOCIATED FILLING OF LAND FOR A PERIOD OF 3 YEARS

SITE LOCATION

VARIOUS LOTS IN D.D. 83, LUNG YEUK TAU, FANLING, NEW TERRITORIES

SCALE	
1 : 2000 @ A4	
DRAWN BY	DATE
CC	29.10.2026
CHECKED BY	DATE
APPROVED BY	DATE

DWG. TITLE

SWEPT PATH ANALYSIS

DWG NO.	VER.
ANNEX 2 PLAN 02	001

Annex 3

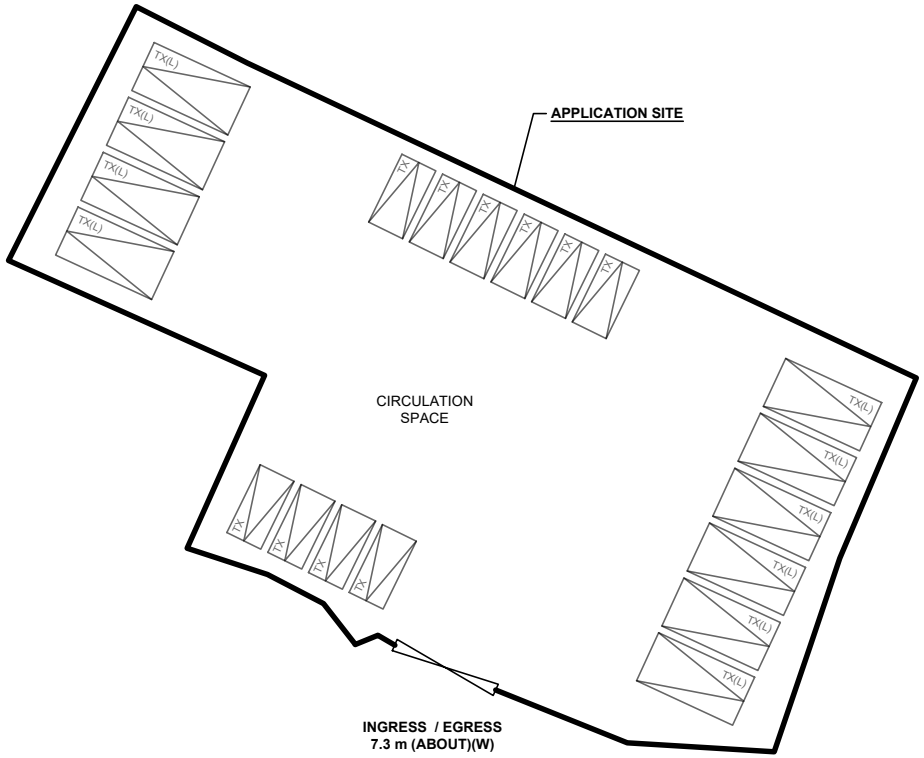
Revised layout plan and

revised pages of Form No. S16-III

DEVELOPMENT PARAMETERS

APPLICATION SITE AREA	: 1,533 m^2	(ABOUT)
COVERED AREA	: NOT APPLICABLE	
UNCOVERED AREA	: 1,533 m^2	(ABOUT)

NO STRUCTURE IS PROPOSED AT THE APPLICATION SITE.



PARKING PROVISION

NO. OF TAXI PARKING SPACE	: 10
DIMENSION	: 5 m (L) x 2.5 m (W)
NO. OF 6-SEATER EV TAXI PARKING SPACE	: 10
DIMENSION	: 7 m (L) x 3.5 m (W)

**SITE BOUNDARY FOR IDENTIFICATION PURPOSE ONLY*

LEGEND

- APPLICATION SITE
- PARKING SPACE (TAXI)
- PARKING SPACE (6-SEATER EV TAXI)
- INGRESS / EGRESS

NORTH

W E

S

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R-RICHES PLANNING LIMITED

PROJECT

PROPOSED TEMPORARY PUBLIC VEHICLE PARK (EXCLUDING CONTAINER VEHICLE) AND ASSOCIATED FILLING OF LAND FOR A PERIOD OF 3 YEARS

SITE LOCATION

VARIOUS LOTS IN D.D. 83, LUNG YEUK TAU, FANLING, NEW TERRITORIES

SCALE

1 : 500 @ A4

DRAWN BY	DATE
CC	29.10.2026
REVISED BY	DATE
APPROVED BY	DATE

DWG. TITLE

LAYOUT PLAN

DWG NO.	VER.
ANNEX 3	001

6. Type(s) of Application 申請類別

(A) Temporary Use/Development of Land and/or Building Not Exceeding 3 Years in Rural Areas or Regulated Areas
位於鄉郊地區或受規管地區土地上及/或建築物內進行為期不超過三年的臨時用途/發展
(For Renewal of Permission for Temporary Use or Development in Rural Areas or Regulated Areas, please proceed to Part (B))
(如屬位於鄉郊地區或受規管地區臨時用途/發展的規劃許可續期，請填寫(B)部分)

(a) Proposed use(s)/development 擬議用途/發展	Proposed Temporary Public Vehicle Park (excluding Container Vehicle) and Associated Filling of Land for a Period of 3 Years (Please illustrate the details of the proposal on a layout plan) (請用平面圖說明擬議詳情)
(b) Effective period of permission applied for 申請的許可有效期	☑ year(s) 年 ..... 3 ..... ☐ month(s) 個月 .....

(c) Development Schedule 發展細節表

Proposed uncovered land area 擬議露天土地面積	1,533 sq.m ☑About 約
Proposed covered land area 擬議有上蓋土地面積	N/A sq.m ☐About 約
Proposed number of buildings/structures 擬議建築物／構築物數目	N/A
Proposed domestic floor area 擬議住用樓面面積	N/A sq.m ☐About 約
Proposed non-domestic floor area 擬議非住用樓面面積	N/A sq.m ☐About 約
Proposed gross floor area 擬議總樓面面積	N/A sq.m ☐About 約

Proposed height and use(s) of different floors of buildings/structures (if applicable) 建築物/構築物的擬議高度及不同樓層的擬議用途 (如適用) (Please use separate sheets if the space below is insufficient) (如以下空間不足，請另頁說明)

N/A

Proposed number of car parking spaces by types 不同種類停車位的擬議數目

Private Car Parking Spaces 私家車車位		N/A
Motorcycle Parking Spaces 電單車車位		N/A
Light Goods Vehicle Parking Spaces 輕型貨車泊車位		N/A
Medium Goods Vehicle Parking Spaces 中型貨車泊車位		N/A
Heavy Goods Vehicle Parking Spaces 重型貨車泊車位		N/A
Others (Please Specify) 其他 (請列明)	Taxi Parking Spaces	10
	6-seater EV Taxi Parking Spaces	10

Proposed number of loading/unloading spaces 上落客貨車位的擬議數目

Taxi Spaces 的士車位	N/A
Coach Spaces 旅遊巴車位	N/A
Light Goods Vehicle Spaces 輕型貨車車位	N/A
Medium Goods Vehicle Spaces 中型貨車車位	N/A
Heavy Goods Vehicle Spaces 重型貨車車位	N/A
Others (Please Specify) 其他 (請列明)	

(i)	Gross floor area and/or plot ratio 總樓面面積及／或地積比率		sq.m 平方米	Plot Ratio 地積比率
		Domestic 住用	N/A ☐ About 約 ☐ Not more than 不多於	N/A ☐About 約 ☐Not more than 不多於
		Non-domestic 非住用	N/A ☐ About 約 ☐ Not more than 不多於	N/A ☐About 約 ☐Not more than 不多於
(ii)	No. of blocks 幢數	Domestic 住用	N/A	
		Non-domestic 非住用	N/A	
(iii)	Building height/No. of storeys 建築物高度／層數	Domestic 住用	N/A	m 米 ☐ (Not more than 不多於)
			N/A	Storeys(s) 層 ☐ (Not more than 不多於)
		Non-domestic 非住用	N/A	m 米 ☐ (Not more than 不多於)
			N/A	Storeys(s) 層 ☐ (Not more than 不多於)
(iv)	Site coverage 上蓋面積		N/A %	☐ About 約
(v)	No. of parking spaces and loading / unloading spaces 停車位及上落客貨車位數目	Total no. of vehicle parking spaces 停車位總數		20
		Private Car Parking Spaces 私家車車位		N/A
		Motorcycle Parking Spaces 電單車車位		N/A
		Light Goods Vehicle Parking Spaces 輕型貨車泊車位		N/A
		Medium Goods Vehicle Parking Spaces 中型貨車泊車位		N/A
		Heavy Goods Vehicle Parking Spaces 重型貨車泊車位		N/A
		Others (Please Specify) 其他 (請列明)		
		Taxi Parking Spaces		10
		6-seater EV Taxi Parking Spaces		10
		Total no. of vehicle loading/unloading bays/lay-bys 上落客貨車位／停車處總數		N/A
		Taxi Spaces 的士車位		N/A
		Coach Spaces 旅遊巴車位		N/A
		Light Goods Vehicle Spaces 輕型貨車車位		N/A
		Medium Goods Vehicle Spaces 中型貨車位		N/A
		Heavy Goods Vehicle Spaces 重型貨車車位		N/A
		Others (Please Specify) 其他 (請列明)		
		_____		
		_____		